

Crysler, Ruby

From: Wight, Brian <brian.wight@aecom.com>
Sent: Monday, May 01, 2017 11:13 AM
To: Chrysler, Ruby; Jacqueline.Grunau@ks.gov; Mark D. Wichman (mark.d.wichman@usace.army.mil); Sansom, Andrea NWO; KNIGHT, COLE D GS-11 USAF AMC 22 CES/CEAN; BLAIR, SHELDON M CTR USAF AMC 22 CES/CEIE; Jose.hurtado@us.af.mil; Cynthia Cash; Krause, Michael; Mowan, Ryan
Subject: McConnell AFB PBR: 18 April 2017 Project Status Meeting Minutes
Attachments: 18APR17_Regulator Project Status Meeting Mins.pdf
Categories: Record Saved - Shared

All,

The minutes referenced above are attached.

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RCRA



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McConnell AFB PBR

Project Status Meeting Minutes

Meeting Date: 18 April 2017

Meeting Time: ~0900 to 1050 hrs.

Participants:

Ruby Crysler, EPA

Jacqueline Grunau, KDHE

Cole Knight, McConnell AFB (phone)

Mark Wichman, USACE (phone)

Brian Wight, URS Group, Inc.

Michael Krause, URS Group, Inc.

Ryan Mowan, URS Group, Inc. (phone)

These minutes document the discussions during the McConnell Air Force Base (AFB) Performance Based Remediation (PBR) project status meeting held from about 0900 hours to 1050 hours on 18 April 2017 at Environmental Protection Agency (EPA) Region 7.

DP013 Geophysical Survey Results

- Based on the results of the geophysical survey, seven areas were identified as having potential metal in the subsurface. The results indicate that areas 1 and 2 are more likely a result of trench and fill operations.
- URS proposes to excavate a “hole” at the center of areas 3 through 7, and a trench through the centroid of areas 1 and 2. The excavations would be dug to 10 feet below ground surface (bgs) or until reaching the material causing the anomaly, whichever occurs first. Since the drums were historically noted as being buried separate from other wastes, the excavation of an area would be abandoned if general refuse material is encountered.
- URS is reviewing Kansas State regulations regarding the disposal of waste/refuse material, if encountered, including potential radioactive waste. At a minimum, excavated soil would be sampled for waste characterization analyses to determine if the soil is hazardous. If characterization results indicate the soil is not hazardous, URS would like to backfill the excavations with the same soil. While awaiting waste characterization results, soil would be stockpiled on plastic sheeting in the interim with controls in place to prevent runoff. URS will confirm with the appropriate authorities at KDHE to develop a disposal plan.
- A work plan will be prepared to outline the excavation activities. The work plan will include text regarding the ambiguity as to how the drums were disposed of. The work is anticipated to be completed this summer.

SS548 Investigation Approach

- The investigation at SS548 to date has included direct push soil and groundwater sampling followed by monitoring well installation and sampling. Contamination encountered in groundwater during the direct push investigation was not duplicated by the monitoring well

groundwater sample results. The monitoring wells capture groundwater from approximately 11 to 24 feet bgs (screened from 13 to 23 feet bgs) while the direct push borings captured groundwater from just below ground surface to 23 feet bgs.

- URS plans to complete another round of sampling from the monitoring wells and to complete additional direct push sampling to investigate the shallow interval (to 11 feet bgs). Sampling from the direct push borings will be a onetime event. The sampling will include analysis for the new total petroleum hydrocarbons. An additional direct push boring will be completed near monitoring well B692-MW2R, bringing the number of planned direct push borings to be completed to seven. Soil cores will be collected from the direct push borings and field screened.
- An addendum to the SS548 Additional Investigation Work Plan Technical Memorandum will be prepared outlining the sampling approach and where the results will be documented. Sample results will be documented with the previously completed work in a single report. The report will outline the phases of work completed and rationale for each phase.

RCRA Permit Proposed Site Combinations

- McConnell AFB indicated that AFLOA has requested separate meeting minutes for any discussions regarding the RCRA Permit renewal and an official letter from KDHE if any conclusions are made during the discussions.
- URS presented a breakdown of Table 3 from the RCRA Permit renewal application: Table 3A presenting SWMU only sites that do not have an IRP identifiers; Table 3B presenting IRP sites, some of which also had SWMU identifiers; and Table 3C presenting the proposed sites for combining with rationale.
- During discussion, McConnell AFB indicated this topic should be tabled and discussed at a separate meeting. The topic was tabled for a separate meeting, likely to occur towards the end of May. EPA and KDHE will review Table 3C and take the information into consideration as part of their review of the RCRA Permit renewal application. URS will send a meeting request to McConnell AFB, who will then forward the request on to AFLOA.

OW971 Monitoring Well Sample Results

- To date, three groundwater sampling events have been completed at monitoring well OW971-MW01 (October 2016, January 2017, and April 2017). There is no apparent trend in the detection of TPH-HRH (detected in January 2017, and nondetect in the other two sampling events). URS will prepare a report that will document the field work completed and sampling results and that will recommend no further action for the site.

TU601 Monitoring Well Sample Results

- TPH-MRH was detected above the USEPA RSL but below the KDHE RSK. URS will prepare an addendum to the RFI Report documenting the field work completed and sample results and update the baseline risk assessment.

IC Boundaries OW633/SS044 and OT547/OW026

- URS asked if identifying an IC boundary within a larger IC boundary was necessary or if it would cause a problem when one of the sites was ready for NFA.
- The EPA clarified that ICs may be required in the Statement of Basis as part of a selected remedy; however, the boundaries of the ICs are not specifically identified in the Statement of Basis in case the boundaries would need to be changed due to changing site conditions. If a site does require ICs, then a boundary does need to be established, and that boundary would be established within the ICIP. If a site advances to no further action after previously having ICs, then the site could be removed from the ICIP, and the boundary that contained the site may or may not change in the ICIP.
- URS will continue preparing IC boundaries for the sites using the approach that multiple sites may be included within a single IC boundary. The location of the individual sites will be shown within the larger boundary.

OW037 RFI Report Corrections

- URS needs to revise the Draft RFI Report previously submitted to include TPH MRH identified in groundwater. Revised pages containing corrections to the RFI Report will be provided to the EPA and KDHE for their review.

Document Priority List Review

- The current document priority list as of 17 April 2017 was discussed.
- The yellow shaded rows are items that have been closed and will be removed from the list. The light green shaded cells are items requiring action by EPA, KDHE, or URS with the action stated in the cell. The dark green shaded rows are items that URS had questions on; these two rows can be removed as they are part of a drafted Statement of Basis under EPA review. The red text is text added to the list since the last version.
- The EPA requested that the “Comments Due Date” column for the RCRA Permit Application be removed or modified as the current date listed will not be met.
- URS asked EPA on the status of Priority Item 1, Responses to EPA’s Comments on the SS544 Draft RFI Report. The EPA stated they needed to check on one potential issue with the risk assessment. McConnell AFB reiterated the importance to finalize that report.
- KDHE requested a fresh, most recent copy of the Risk Assessment Terminology Technical Memorandum.

SS032 Sample Results

- The groundwater sample results for metals and turbidity correlation at SS032 was discussed.
- Turbidity was recorded during collection of the groundwater samples. Turbidity was high in most samples; however, there was no pattern or correlation between turbidity values and metals results in groundwater samples.

- The risk assessment was updated to calculate background metals risk using the 95% UTL concentrations in groundwater. After subtracting the background risk, the hazard index was still greater than 100 for the receptors.
- URS asked if the available data was sufficient to achieve no further action at the site by attributing high metals concentrations in groundwater to high turbidity values. The EPA stated that would likely not be possible. The next step to get to no further action would require collecting paired (filtered and unfiltered) groundwater samples for metals analysis. The additional field work would require getting a flightline waiver which McConnell AFB indicated would take approximately 3 to 4 months to get. The EPA will discuss with the risk assessor to get a recommendation for the number of sampling points required prior to developing a work plan.

Other

- The next meeting was scheduled for 9 May 2017 at 0900 at EPA Region 7.